

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

Docket No. 2021-66-A

In the Matter of:

South Carolina Office of Regulatory Staff's Motion
to Solicit Comments from Utilities and Other
Interested Stakeholders Regarding Measures to Be
Taken to Mitigate Impact of Threats to Safe and
Reliable Utility Service

**PETITION TO INTERVENE OF
GOOGLE, LLC**

Google, LLC (hereinafter, "Google"), pursuant to Rule 103-825, respectfully submits this petition to intervene in the above-captioned proceeding currently pending before the South Carolina Public Service Commission (the "Commission"). In support of its petition, Google states as follows:

1. Governor Henry McMaster, in a February 19, 2021 letter to Office of Regulatory Staff ("ORS") Executive Director Nanette Edwards, requested that ORS, following widespread power outages in Texas due to winter weather, "...undertake a comprehensive review of the State's public and private power grid to evaluate its ability to withstand potential ice storms and other dangerous winter weather conditions."¹

2. In the Governor's letter, he suggested broad stakeholder participation "to assist ORS in this important effort." In particular, the Governor encouraged any "interested parties," including parties not regulated by ORS or the Commission, to intervene in the proceeding so as to "facilitate a comprehensive and collaborative review."²

¹ See February 22, 2021 Motion of ORS, Exhibit 1.

² *Id.*

3. On February 22, 2021, ORS responded by requesting that the Commission open a docket to require that electric and natural gas utilities provide information to the Commission regarding measures that have been taken or will be taken to:

- Mitigate the negative impacts of ice storms and other dangerous weather conditions to the provision of safe and reliable utility service, and
- Ensure peak customer demands on the utility system can be met during extreme weather scenarios.

4. The Commission has since opened the above-captioned proceeding which is now pending.

5. On March 8, 2021, ORS submitted correspondence to the Commission proposing a procedural schedule for the captioned matter that would, in ORS's description, allow "participating stakeholders sufficient time to provide their comments and input." To that end, ORS proposed a deadline of June 11, 2021—more than three months from today—for interested parties to submit comments.

6. The Commission has not yet acted on ORS's proposed timeline and no procedural schedule has been established. In fact, Google is only the second party which has thus far moved to intervene and participate in the proceeding. As such, Google's petition is quite early in the proceeding and clearly timely.

7. Google has a strong interest in the outcome of this proceeding. Google is a leading technology company and innovator in many fields, including in smart and sustainable energy. More immediate to this proceeding, however, are Google's interests as a significant energy consumer in South Carolina. Google operates data centers in several Southeastern states, including but not limited to South Carolina. All of these data centers, both in South Carolina and elsewhere in the region, would be impacted by energy reliability issues, if any, in South Carolina.

Accordingly, Google has a strong interest in participating here and providing its perspective on the importance of reliability to the Commission.

8. Accordingly, Google has a direct and substantial interest in the outcome of this proceeding and will be directly affected by the discussion and resolution of the topics covered therein. Google's position and presence relates directly to the details of this docket. Google has or will have projects, sites, or initiatives that may be impacted by the decisions the Commission makes following its review and evaluation of South Carolina's power grid and its ability to withstand potentially damaging winter storms and other dangerous weather conditions. Implementation of any recommendations by the parties will likely impact, either expanding or limiting, deployment of Google products and services in South Carolina.

9. Google would add constructively to this matter by clarifying certain issues and contributing to the development of a complete record based on its unique, significant interests in employing its technology to assist power companies, consumers, and others throughout the state.

10. Granting Google's request to intervene in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it and is consistent with the intent of the Governor's request.

11. Google's participation will not delay the proceeding in any manner. Google would fully and cooperatively participate in the manner expected of a party to the proceeding.

12. Google's interest in this proceeding cannot be adequately represented or protected by any other party.

13. Pursuant to Rule 103-804, Google states that it is represented by the following counsel in this proceeding:

Weston Adams, III
weston.adams@nelsonmullins.com
Courtney E. Walsh
court.walsh@nelsonmullins.com

Nelson Mullins Riley & Scarborough
1320 Main Street
Meridian- 17th Floor
Columbia, South Carolina 29201
Telephone: 803-255-9243

WHEREFORE, Petitioner Google, LLC, prays that it be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 10th day of March, 2021.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s/ Weston Adams, III
Weston Adams, III (SC Bar No. 64291)
E-Mail: weston.adams@nelsonmullins.com
Courtney E. Walsh (SC Bar No. 72723)
E-Mail: court.walsh@nelsonmullins.com
1320 Main Street / 17th Floor
Post Office Box 11070 (29211-1070)
Columbia, SC 29201
(803) 799-2000

Attorneys for Google, LLC

Columbia, South Carolina
March 9, 2021

CERTIFICATION

I, Raiford Smith, state that I am Director Energy, Location & Strategy for Google, LLC (“Google”) and that I am authorized to make this Certification on behalf of Google. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are proven to be willfully false that I am subject to possible punishment by contempt.³

/s/Raiford Smith
Raiford Smith
Director Energy, Location & Strategy

March 9, 2021

³ See South Carolina Sup. Ct. Order 2020-04-22-01, “Operation of the Trial Courts During the Coronavirus Emergency (As Amended December 16, 2020),” Section 16 (Certification in Lieu of Affidavit).

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

Docket No. 2021-66-A

In the Matter of:

South Carolina Office of Regulatory Staff's Motion
to Solicit Comments from Utilities and Other
Interested Stakeholders Regarding Measures to Be
Taken to Mitigate Impact of Threats to Safe and
Reliable Utility Service

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day one copy of the **Petition to Intervene of Google, LLC** to the persons named below at the addresses set forth via electronic mail and e-filing:

Benjamin P. Mustian, Esquire
Office of Regulatory Staff
bmustian@ors.sc.gov

Jenny R. Pittman, Esquire
Office of Regulatory Staff
jpittman@ors.sc.gov

Roger P. Hall, Asst. Consumer
Advocate
SC Department of Consumer Affairs
rhall@scconsumer.gov

Carri Grube-Lybarker, Esquire
SC Department of Consumer Affairs
clybarker@scconsumer.gov

Heather S. Smith, Esquire
Duke Energy Carolinas, LLC
Duke Energy Progress, LLC
heather.smith@duke-energy.com

Rebecca J. Dulin, Esquire
Duke Energy Carolinas, LLC
Duke Energy Progress, LLC
rebecca.dulin@duke-energy.com

K. Chad Burgess, Esquire
Dominion Energy SC, Inc.
chad.burgess@dominionenergy.com

Matthew W. Gissendanner, Esquire
Dominion Energy SC, Inc.
matthew.gissendanner@dominionenergy.com

Amber D. Daniels, Esq.
Stephen R. Pelcher, Esq.
South Carolina Public Service Authority
amber.daniels@santeecooper.com
srpelche@santeecooper.com

/s/ Weston Adams, III
Weston Adams, III

Columbia, South Carolina
March 9, 2021